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May 25, 2017

## VIA ECF & FIRST CLASS MAIL

Hon. Denis R. Hurley United States District Court Judge United States District Court Eastern District of New York 100 Federal Plaza Central Islip, NY 11722-9014

Re: Playe

Players Network, Inc. v. Vis Vires Group, Inc., et al

Case No.: CV-16-00697

(DRH) (AKT)

## Honorable Sir:

This office represents Vis Vires Group, Inc. and all other defendants in the above entitled action except for Clear Trust LLC which never appeared. We are writing in response to the status report order of May 23, 2017.

We are pleased to advise the Court that this matter has been settled in its entirety pursuant to a fully executed Settlement Agreement which has been complied with by all parties in all respects. Closure of the case has been delayed because of the following circumstances:

The plaintiff was originally represented by a Nevada attorney Jerry Donohue, Esq. due to the fact that the action began as a Nevada state court case which was remanded to the United States District Court for Nevada and thereafter transferred to the Eastern District of New York. To the best of our knowledge and belief and based upon a review of the docket, Mr. Donohue was never discharged or replaced as plaintiff's counsel. However, he declined to participate in the action upon the grounds that he was not admitted in the State of New York or in the Eastern District of New York.

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Subsequently, the plaintiff was represented by a transactional attorney, Sunny Barkats, Esq. who also declined to appear in the action even though he was successful in concluding the Settlement Agreement with this office. Attempts to contact Mr. Donohue to get him to sign off on a Stipulation of Dismissal with Prejudice have been unavailing. We also had direct talks with the principal of the plaintiff, Mr. Mark Bradley who advised that he would get Mr. Donohue to execute such a stipulation. To date, however, all requests in that regard have gone unanswered.

Under the circumstances, it is respectfully requested that the Court close the case as there is no further action to be taken.

Respectfully yours,

Robert P. Johnson (RPJ-7985)

RPJ:ael

cc:

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